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not import a condition, but simply pointed out the time within which the gift was to be enjoyed, and he held that during widowhood meant until the donee died or married again.—Canada Law Journal

Fruits and Candies Must Be Protected from Flies and Dust.—The healthful city of St. Paul passed an ordinance providing that all fruits and candies exposed for sale outside of a building, or in any wagon or cart, shall be protected from both flies and dust. One Bacigalupo, an Italian fruit vender, was arrested for violating this ordinance. From an order of the district court denying a writ of habeas corpus he appeals. Judge Lewis, of the Supreme Court of Minnesota, in *Ex parte Bacigalupo*, 132 Northwestern Reporter, 303, affirms the lower court decision, and holds that the ordinance is not an unnecessary interference with private rights, is not an unreasonable requirement, or impossible of performance, and is not in restraint of trade, or contrary to the provisions of the State or federal Constitution. The ordinance was bitterly criticised because its provisions include all fruits, such as oranges and bananas, which it was claimed require no protection. The judge holds that while, no doubt, a distinction may be drawn between such fruits and others, such as berries, it is not for the courts to say that even oranges and bananas should not be protected against the accumulation of dust and the approach of flies. "Surely," says the judge, "even those fruits are much more wholesome and less dangerous in scattering germs when kept free from flies and dust." Wholesale or commission houses come within this ordinance.

Injunction to Prevent Disclosure of Trade Secrets.—In a suit to enjoin a servant from disclosing trade secrets, consisting of specific methods or secret processes for the manufacture of commercial oxygen, the United States Circuit Court, in *S. S. White Dental Mfg. Co. v. Mitchell*, 188 Federal Reporter, 1017, holds that it was no objection to the issuance of an injunction that plaintiff failed to point out any specific methods or secret processes which it was proposed to enjoin defendant from disclosing, since the general provision of the order prohibiting action in violation of defendant's contract of employment would be no more indefinite than was the threatened injury, and, if the injunction was enforceable at all, it would be enforceable as well against any disclosure as against any particular process or device. Where the servant terminated his contract and took employment with another concern in the same line of business, but denied that he intended to violate his contract, the court holds that an injunction restraining him from violating it would not be granted as a threat, since he was as much bound by his contract not to disclose after taking up his new employment as before.